



## COUNCIL ON ENVIRONMENTAL QUALITY

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Peter Hearn  
*Executive Director*

April 22, 2020

Melanie Bachman, Executive Director  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

RE: DOCKET NO. 488 - Homeland Towers, LLC and New Cingular Wireless PCS, LLC d/b/a AT&T application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility located at one of two sites: Kent Tax Assessor ID #M10, Block 22, Lot 38 Bald Hill Road or 93 Richards Road, Kent, Connecticut.

Dear Ms. Bachman:

The Council on Environmental Quality (“the Council”) has reviewed the application submitted in Docket 488 for a Certificate of Environmental Compatibility and Public Need. The Council offers the following comments for consideration by the Applicant and Siting Council.

### 1. Visual Impact

The Council acknowledges that the availability of cell phone service is an essential amenity for residents and tourists who are visiting scenic areas. This poses the paradox that cell tower placement can detract from the scenic values that attract tourism.

Northwestern Connecticut is among the State’s most scenic areas and preservation of its vistas has both ecological and economic value. Congress designated this region as the Upper Housatonic Valley National Heritage Area – one of just 50 such designations in the country. The region is designated in Connecticut’s Forest Legacy program as an area of critical conservation focus, and The Appalachian Trail, a National Scenic Trail abuts the Housatonic River in Kent. Numerous State parks are located in the area, including Kent Falls State Park, Macedonia Brook State Park, and Lake Waramaug State Park. State Route 7 in Kent and a portion of State Route 478 East, north of State Route 45 along portions of Lake Waramaug, have been designated as “State Scenic Roads”. In addition, there are locally designated scenic roads in Kent.

Given these facts, special attention must be paid to the siting of telecommunications tower or to methods to reduce the visual impact.

Absent from the Docket's submission is a visibility analysis for Lake Waramaug, Lake Waramaug State Park, and the ridge located west of Lake Waramaug Road for proposed Site B even though this area is within the two-mile viewshed analysis study area (buffer). In addition, only a very small portion of Route 7 was included in the two-mile viewshed analysis study area for the Proposed Site A and no part of State Route 7 for proposed Site B. The Council recommends that the Applicant supplement the viewshed analysis to include, where appropriate, the designated local and State Scenic Roads, State Parks, trails and other recreational resources noted above.

Additionally, Proposed Site B is located in a Horizonline Conservation District, which prohibits the construction of new towers per the Town's Zoning Regulations, Section 9660.1. It would be best if the town's regulations could be honored, given that there exists a proposed alternative location.

The Docket filing contains only one map for each proposed site depicting 700 MHz LTE coverage at the proposed height of 150 feet AGL. Given the scenic considerations described above, the Council asks whether a Radio Frequency Analysis, had been performed to assess whether a tower below 150 AGL would provide acceptable coverage.

Thank you for your consideration of these comments. Please do not hesitate to contact the Council if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Peter Hearn". The signature is written in black ink and is positioned above the printed name.

Peter Hearn

Executive Director